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15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 SILVER CREEK CAPITAL, LLC, a Nevada  
18 limited liability company,

19 Case No. 2:22-cv-01515-JCM-EJY

20 Plaintiff,

21 v.

22 NATIONAL DEFAULT SERVICING  
23 CORPORATION, an Arizona corporation;  
24 BANK OF AMERICA, N.A., a national banking  
25 association; DOES I through X; and ROE  
26 BUSINESS ENTITIES I through X, inclusive,

27 **STIPULATION AND ORDER FOR**  
28 **EXTENSION OF TIME TO RESPOND TO**  
29 **COMPLAINT**

30 **(FIRST REQUEST)**

31 Defendants.

32 Plaintiff Silver Creek Capital, LLC and defendant Bank of America, N.A. (**BANA**) stipulate  
33 as follows:

34 1. BANA removed this case on September 12, 2022.  
35 2. BANA's response to the complaint is due September 19, 2022.  
36 2. Golden Creek intends to file a motion to remand in the coming weeks.  
37 3. BANA shall have until ten (10) days after the court makes a decision on jurisdiction  
38 to file its responsive pleading to the complaint.

39 ...

1           Good cause exists to grant the requested extension. BANA is requesting additional time to  
 2 not waste time and resources while it waits for this court's decision on jurisdiction. BANA prefers to  
 3 file one responsive pleading—either in federal or state court, depending on the court's decision.

4           This is the parties' first request for an extension of this deadline, and is not intended to cause  
 5 any delay or prejudice to any party.

6           DATED this 15th day of September, 2022.

<p><b>AKERMAN LLP</b></p> <p><u>/s/ Scott Lachman</u>    MELANIE D. MORGAN, ESQ.    Nevada Bar No. 8215    SCOTT R. LACHMAN, ESQ.    Nevada Bar No. 12016    1635 Village Center Circle, Suite 200    Las Vegas, NV 89134</p> <p><i>Attorneys for Bank of America, N.A.</i></p>	<p><b>HONG &amp; HONG LAW OFFICE</b></p> <p><u>/s/ Joseph Y. Hong</u>    JOSEPH Y. HONG, ESQ.    Nevada Bar No. 5995    1980 Festival Plaza Drive, Suite 650    Las Vegas, NV 89135</p> <p><i>Attorney for Silver Creek Capital, LLC</i></p>
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14           IT IS SO ORDERED.

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 16           UNITED STATES MAGISTRATE JUDGE

17           DATED: September 15, 2022